



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2264

DATE SCANNED 7-5-11

SCANNER NO. 2

SCAN OPERATOR Jmw

11092654793



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 25, 2011

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer
Acting Staff Director

FROM: Patricia Carmona *NYI for PC*
Chief Compliance Officer

Debbie Chacona *NYI for DC*
Assistant Staff Director
Reports Analysis Division

BY: Jodi Winship *W*
Compliance Branch

SUBJECT: Reason to Believe Recommendation -
Failure to File 48-Hour Notices under the Administrative Fine Program

Attached is the name of a principal campaign committee that has failed to file 48-hour notices with the Commission for contributions of \$1,000.00 or more received from the close of books for the New York 12 Day Pre-Primary Report up to 48 hours before the September 14, 2010 Primary Election in accordance with 2 U.S.C. § 434(a)(6) and 11 CFR. § 104.5(f). The committee, Bob Turner for Congress, represents a candidate who won the Primary Election and lost the General Election. The committee is being referred for failing to file 48-hour notices for contributions totaling \$53,400.00.

A 48-hour notice is required to report all contributions of a \$1,000.00 or more, to any authorized committee of a candidate, including contributions from the candidate, loans from the candidate and other non-bank sources and endorsements or guarantees of loans from banks, as per, 11 CFR § 104.5(f).

We have attached an information sheet which includes the contributor name, date of receipt and amount of the contributions for which a 48-hour notice was not filed.

In accordance with the schedule of civil money penalties outlined within 11 CFR § 111.44, this committee should be assessed the civil money penalty so indicated.

Recommendation

1. Find reason to believe that Bob Turner for Congress and Kevin P. Turner, Treasurer, violated 2 U.S.C. § 434(a)(6) and make a preliminary determination that a civil money penalty of \$5,670.00 be assessed.
2. Send the appropriate letter.

Attachment

11092654795

Contributions for Which a 48-Hour Notice Was Not Received

AF: 2264

Committee ID: C00483495

Committee Name: Bob Turner for Congress

Report Type: October Quarterly Report (8/26/2010 – 9/30/2010)

48-Hour Reporting Period: 8/26/2010 – 9/11/2010

CONTRIBUTOR	DATE	AMOUNT
TURNER, ROBERT L	9/01/2010	\$1,200.00
BARMAPOV, BENNY	9/03/2010	\$1,000.00
TURNER, ROBERT L	9/03/2010	\$50,000.00
NACIONAL, DAWN	9/10/2010	\$1,200.00
	TOTAL	\$53,400.00

Proposed Civil Money Penalty: \$5,670.00 ((3 Notices Not Filed at \$110 each) + (10% of the Overall Contributions Not Filed))

11092654797

Federal Election Commission
Reason to Believe Circulation Report
48-Hour Notification Report

1/25/2011 4:09 PM

AF#	Committee ID	Committee Name	State	Election	Candidate Name	Treasurer	Prev Violations	Notices Not Filed	LOA	Penalty
2264	C00483485	BOB TURNER FOR CONGRESS	NY	2010	TURNER, ROBERT L.	KEVIN P. TURNER	0	3	\$53,400	\$5,670

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation –) AF 2264
Failure to File 48-Hour Notices under the)
Administrative Fine Program)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 27, 2011, the Commission decided by a vote of 6-0 to take the following actions in AF 2264:

1. Find reason to believe that Bob Turner for Congress and Kevin P. Turner, Treasurer, violated 2 U.S.C. § 434(a)(6) and make a preliminary determination that a civil money penalty of \$5,670 be assessed.
2. Send the appropriate letter.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

January 28, 2011
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 1, 2011

Kevin P. Turner, in official capacity as Treasurer
Bob Turner for Congress
85-49 105th Street
Richmond Hill, NY 11418

C00483495
AF#: 2264

Dear Mr. Turner:

The Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, *et seq.* ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate or the Federal Election Commission ("FEC"), and the Secretary of State, as appropriate, of any contribution of \$1,000 or more, received by any authorized committee of the candidate after the 20th day, but more than 48 hours before, any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* These notification requirements are in addition to all other reporting requirements. 2 U.S.C. § 434(a). Our records indicate that Bob Turner for Congress did not submit 48-Hour Notices for contributions of \$1,000 or more, received between August 26, 2010 and September 11, 2010, totaling \$53,400, as required by 2 U.S.C. § 434(a)(6)(A). Attachment 1.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On January 27, 2010, the FEC found that there is Reason to Believe ("RTB") that Bob Turner for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file the 48-Hour Notices. Based on the FEC's schedule of civil money penalties at 11 C.F.R. § 111.44, the amount of your civil money penalty calculated at the RTB stage is \$5,670. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 2. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. The amount of the civil money penalty is \$110 for each non-filed notice plus 10 percent of the dollar amount of the contributions not timely reported. The civil money penalty increases by 25 percent for each prior violation. Send your payment of \$5,670 within forty (40) days of the finding, or by March 8, 2011.

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or March 8, 2011. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Bob Turner for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. § 111.45.


3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ian Wandner in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,


Cynthia L. Bauerly
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.44, the amount of your civil money penalty calculated at RTB is \$5,670 for the 2010 New York Primary Election 48-Hour Notification Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by March 8, 2011. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Bob Turner for Congress

FEC ID#: C00483495

AF#: 2264

PAYMENT DUE DATE: March 8, 2011

PAYMENT AMOUNT DUE: \$5,670

11092654802

Contributions for Which a 48-Hour Notice Was Not Received

AF: 2264

Committee ID: C00483495

Committee Name: Bob Turner for Congress

Report Type: October Quarterly Report (8/26/2010 – 9/30/2010)

48-Hour Reporting Period: 8/26/2010 – 9/11/2010

CONTRIBUTOR	DATE	AMOUNT
TURNER, ROBERT L	9/01/2010	\$1,200.00
BARMAPOV, BENNY	9/03/2010	\$1,000.00
TURNER, ROBERT L	9/03/2010	\$50,000.00
NACIONAL, DAWN	9/10/2010	\$1,200.00
TOTAL		\$53,400.00

Proposed Civil Money Penalty: \$5,670.00 ((3 Notices Not Filed at \$110 each) + (10% of the Overall Contributions Not Filed))

Attachment 4

Attachment 1

11092654803

FEC OFFICE OF
ADMIN REVIEW

2011 MAR -1 A 11: 52

Federal Election Commission
Office of Administrative Review
Federal Election Commission
999 E Street, North West
Washington, DC, 20963
AF # 2264

February 17, 2011

Dear Sir:

I am writing to you as Treasurer of the Bob Turner for Congress campaign in New York's 9th Congressional District, 2010. The Campaign received a notice from your office on February 1, 2011 along with a fine for \$5670. According to the letter, this fine is imposed because the campaign did not file with the Federal Election Commission (FEC) twenty days prior to the primary, as per FEC requirements.

The Campaign was not obligated to file because there was no primary election. On the September 14, 2010 elections held in New York's 9th CD, Bob Turner did not appear on any ballot. Though other statewide candidates did indeed have primary opponents, Bob Turner did not. Further, we dispute that Bob Turner was a candidate and ran "unopposed" as it is impossible to be a candidate in an election if one's name is not even on a ballot. No one on September 14th in New York's 9th CD voted for Bob Turner. There was no primary election.

With respect for the FEC and their mission to ensure the fairness and equal opportunity of all Americans to participate in the electoral process, the Campaign kindly asks that this fine be revoked. Thank you.

Sincerely,



Kevin P. Turner
Treasurer
Bob Turner for Congress

11092654804



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Via First Class Mail

March 1, 2011

Kevin P. Turner, in official capacity as Treasurer
Bob Turner for Congress
85-49 105th Street
Richmond Hill, NY 11418

C00483495
AF# 2264

Dear Mr. Turner:

On March 1, 2011, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in black ink, appearing to read "Dayna C. Brown".

Dayna C. Brown
Reviewing Officer
Office of Administrative Review

11092654805

2011 MAR 17 A 7 15

Date: March 16, 2011

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 2264

Committee Name: Bob Turner for Congress

Committee ID#: C00483495

Committee Address (if different than in RTB letter): N/A

Treasurer Name (if different than in RTB finding): N/A

Attachments:

**Copy of RTB Circulation Report, dated January 25, 2011 and RTB
Certification, dated January 27, 2011 (Y/N): Y**

Attachment #: 1

Proof of Delivery (to be forwarded at later date if not yet received) (Y/N): Y

Attachment #: 2

Other Relevant Telecoms (Y/N): N

Attachment #: N/A

Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N

Attachment #: N/A

RAD Staff Declaration (Y/N): Y

-2010 New York Primary Election Report Notice, dated August 10, 2010.

-RFAI Letter, dated November 23, 2010.

-RTB Letter dated February 1, 2011.

Attachment #: 4

Other RAD Information: (Y/N): N

Attachment#: N/A

11092654806



Proof of Delivery

[Close Window](#)

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number:	1ZWF58600198444557
Service:	UPS Next Day Air®
Weight:	1.00 lb
Shipped/Billed On:	02/01/2011
Delivered On:	02/02/2011 9:50 A.M.
Delivered To:	RICHMOND HILL, NY, US
Left At:	Front Door

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 02/07/2011 1:40 P.M. ET

[Print This Page](#)

[Close Window](#)

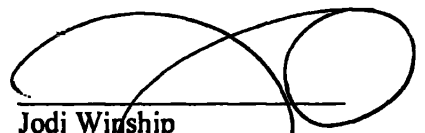
11092654807

DECLARATION OF JODI WINSHIP

1. I am the Acting Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Acting Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Bob Turner for Congress:
 - A) Prior Notice, dated August 10, 2010, referencing the reporting requirements of 48-Hour Notices (sent via electronic mail to: LAURA4BOBTURNER@AOL.COM);
 - B) Request for Additional Information Letter, dated November 23, 2010, Referencing the missing 48-Hour Notices;
 - C) Reason-to-Believe Letter, dated February 1, 2011, referencing the missing 2010 48-Hour Notices.

I hereby certify that I have searched the Commission's public records and find that Bob Turner for Congress filed the 2010 October Quarterly Report with the Commission on October 22, 2010 and has not filed the 2010 48-Hour Notices of Contributions.

3. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 16th day of March, 2011.



Jodi Winship
Acting Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



PRIMARY ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

NEW YORK

August 10, 2010

POLITICAL COMMITTEES INVOLVED IN THE PRIMARY (09/14/10):

REPORT	REPORTING PERIOD ¹	REGISTRATION OR FILING MAILING DEADLINE	FILING DEADLINE
Pre-Primary	07/01/10 - 08/25/10	08/30/10	09/02/10
48-Hour Notices	08/26/10 - 09/11/10	-- NY primary candidates only -- see filing info --	
October Quarterly	08/26/10 - 09/30/10	10/15/10	10/15/10

WHO MUST FILE

The following committees must file the New York Pre-Primary Report:

- **Principal campaign committees** of congressional candidates (including unopposed candidates and candidates whose names do not appear on the ballot) who seek election in the primary election must file the above reports and notices.
- **PACs and party committees** filing on a quarterly basis in 2010 are subject to pre-election reporting if they make previously undisclosed contributions or expenditures (including independent expenditures) in connection with an election by the close of books of the applicable report(s).

Supplemental Filing Information is available:

- [Congressional Committees](#)
- [Parties and PACs](#)

[Additional information for New York Campaign Committees -- click here](#)

¹ These dates indicate the beginning and end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

2010 SUPPLEMENTAL FILING INFORMATION CONGRESSIONAL COMMITTEES

PLEASE NOTE: The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

WHO MUST FILE

Principal campaign committees of congressional candidates ¹ (including unopposed candidates and candidates whose names do not appear on the ballot) must file Quarterly Reports in 2010. ²

Campaigns that raise or spend more than \$5,000 for the 2010 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2010, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. See 11 CFR 104.5(a)(2).

Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

METHODS OF FILING REPORTS

Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e).

- Web Page: Electronic Filing Page
- Campaign Guide for Congressional Candidates and Committees (Candidate Guide), pp. 82-84 [PDF]

Paper Filing - Meeting the Filing Deadline

Paper Report filing options -- Registered, Certified or Overnight or First Class Mail.
See 11 CFR 104.5(e).

- Web Page: Link to Paper Forms (for downloading and printing)
- Candidate Guide, p. 81 [PDF]

¹ Generally, an individual becomes a candidate for federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not crossed the \$5,000 threshold, it is not required to file reports. See 11 CFR 100.3(a).

² If a candidate has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 3Z [PDF].

PRE- AND POST-ELECTION REPORTS

A committee whose candidate participates in a 2010 state primary, nominating convention or runoff election -- even if unopposed -- must also file a pre-election report 12 days prior to the primary, nominating convention or runoff. The campaign committee of a candidate who participates in the general election must file pre- and post-general election reports.

See 11 CFR 104.5(a)(2).

- Web Page: 2010 Congressional Pre-Primary Reporting Dates
- The Record: January 2010 issue [PDF]
- Candidate Guide, pp. 79-80 [PDF]

COMPLIANCE

Treasurer Responsibility

Committee Treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.

See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings [PDF]
- Candidate Guide, p. 7 [PDF]

Administrative Fine Program

Political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- and non-filers).³

See 11 CFR 111.30.

- Web Page: Administrative Fine Program
- Candidate Guide, pp. 81-82 [PDF]

IMPORTANT FILING INFORMATION - PAPER FILERS

In response to the 2001 anthrax threat, the U.S. Postal Service is irradiating mail directed to many federal agencies, including the FEC and the Secretary of the Senate.⁴ This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than U.S. mail. Alternative methods include electronic filing, overnight mail or delivery service, and hand delivery.

2010 REPORTING SCHEDULE

- Web Page: 2010 Reporting Dates Page
- The Record: January 2010 issue [PDF]
- Candidate Guide, p. 79 [PDF]

³ Penalties for late- or non-filing of 48-hour notices are based on the amount of contributions not timely disclosed. As a result, these penalties may exceed \$17,600, even for first-time violations.

⁴ Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via US mail.

DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Campaign committees must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,000 during the applicable reporting period (see page 1 of this notice). See 11 CFR 104.22 and 11 CFR 110.17(e).

- The Record: March 2009 issue [PDF]
- Federal Register: Notice 2009-03 (February 17, 2009) [PDF]; Notice 2010-02 (2/24/10) [PDF].

SUPPLEMENTAL FILING INFORMATION NEW YORK CAMPAIGN COMMITTEES ONLY

48 HOUR NOTICES ON CONTRIBUTIONS

Notices are required if the committee receives any contribution (including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of bank loans to the candidate or committee) of \$1,000 or more per source, during the period of August 26 through September 11, 2010.

The notices must reach the appropriate federal filing office within 48 hours of the committee's receipt of the contribution(s). **Campaign committees that file electronically MUST submit their 48-hour notices electronically.** See 11 CFR 104.5(f).

- Web Page: Link to Paper Forms (for downloading and printing)
- Form 6 Fax numbers
 - Senate campaigns (Secretary of the Senate): (202) 224-1851
 - House Campaigns (FEC): (202) 219-0174
- Campaign Guide: Candidate, p. 80 [PDF].

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

2010 SUPPLEMENTAL FILING INFORMATION PACs AND PARTY COMMITTEES

PLEASE NOTE: The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file either quarterly or monthly reports in 2010. See 11 CFR 104.5(c). Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

METHODS OF FILING REPORTS

Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e).

- Web Page: Electronic Filing Page
- Campaign Guide: Nonconnected Committees (Nonconnected), pp. 51-53 [PDF]; Corporations and Labor Organizations (SSF), pp. 49-51 [PDF]; Political Party Committees (Party), pp. 69-71 [PDF].

Paper Filing -- Meeting the Filing Deadline

Paper report filing options -- Registered, Certified or Overnight or First Class Mail.

See 11 CFR 104.5(e).

- Web Page: Link to Paper Forms (for downloading and printing)
- Campaign Guide: Nonconnected, pp. 47-48 [PDF]; SSF, pp. 45-46 [PDF]; Party, p. 65 [PDF].

PRE-ELECTION REPORTING

Quarterly filing committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See 11 CFR 104.5(c)(1)(ii).

- Web Page: 2010 Congressional Pre-Primary Reporting Dates Page
- The Record: January 2010 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

2010 REPORTING SCHEDULE

- Web Page: 2010 Reporting Dates Page
- The Record: January 2010 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

COMPLIANCE

Treasurer Responsibility

Committee treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time. See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceeding [PDF]
- Campaign Guide: Nonconnected, pp. 3-4 [PDF]; SSF, pp. 1-2 [PDF]; Party, pp. 6-7 [PDF].

Administrative Fine Program

Failure to file reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- or non-filers). See 11 CFR 111.30.

- Web Page: Administrative Fine Program Page
- Campaign Guide: Nonconnected, pp. 48-49 [PDF]; SSF, p. 46 [PDF]; Party, p. 66 [PDF].

DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Party committees and Leadership PACs must simultaneously file FEC Form 3L if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,000 during the covered period (see page 1 of this notice).

See 11 CFR 104.22 and 110.17(e).

- The Record: March 2009 issue [PDF]
- Federal Register: Notice 2009-03 (2/17/09) [PDF]; Notice 2010-02 (2/24/10) [PDF].
- Campaign Guide: Party, pp. 143-149 [PDF]

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing and may change their filing frequency no more than once per calendar year. See 11 CFR 104.5(c).

- Web Page: Filing Frequency by Type of Committee
- Campaign Guide: Nonconnected, p. 51 [PDF]; SSF, p. 49 [PDF]; Party, p. 67 [PDF].

48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in 2010 may have to disclose this activity within 48- or 24-hours based upon the date and amount of the expenditure. See 11 CFR 104.4.

- Web Page: 48- and 24-hour periods for independent expenditures for 2010 elections
- Campaign Guide: Nonconnected, pp. 72-74 [PDF]; SSF, pp. 65-67 [PDF]; Party, pp. 87-89 [PDF].

These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1180

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 23, 2010

Kevin P. Turner, Treasurer
Bob Turner for Congress
78-81 81st Street
Glendale, NY 11385

Response Due Date:
December 28, 2010

Identification Number: C00483495

Reference: October Quarterly Report (8/26/10 - 9/30/10)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 2 items:

1. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information. (11 CFR § 104.5(f))
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your

report discloses contributions from individuals for which the identification is not complete.

Additionally, the following employer and occupation entries appear on your report and are not considered acceptable: "omitted/physician," "self employed/omitted," "self/business owner" and "omitted/CPA."

You must provide the missing information or clarify the information provided. If you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a request via mail, e-mail or telephone documented in writing. (11 CFR § 104.7(b)(2)) Follow-up requests should be done, if necessary. The requests must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information and a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide for Congressional Committees and Candidates.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1154.

Sincerely,



Jill Sugarman
Senior Campaign Finance Analyst
Reports Analysis Division

476

Missing 48-hour notices
Bob Turner for Congress (C00483495)
October Quarterly Report (8/26/10 - 9/30/10)
Primary Election 2010
48 Hour Notice Period (8/26/10 - 9/11/10)

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Barmapov	Benny	9/3/2010	\$1,000.00	G2010
Naelonal	Dawn	9/10/2010	\$1,200.00	G2010
Turner	Robert L	9/1/2010	\$1,200.00	G2010
Turner	Robert L	9/3/2010	\$50,000.00	G2010

110020051218



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2011 MAR 21 P 4: 51

SENSITIVE

March 21, 2011

MEMORANDUM

To: The Commission

Through: Alec Palmer *AP*
Acting Staff Director

From: Patricia Carmona *PC*
Chief Compliance Officer

Dayna C. Brown *DB*
Reviewing Officer
Office of Administrative Review

Subject: Reviewing Officer Recommendation in AF# 2264 – Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer (C00483495)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment

11092554819



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 2011

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 2264 – Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer
(C00483495)

Summary of Recommendation

Make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$5,670 civil money penalty.

Reason-to-Believe Background

On January 27, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file 48-Hour Notices for 3 contributions and 1 loan totaling \$53,400 for the 2010 New York Primary Election and made a preliminary determination that the civil money penalty was \$5,670 based on the schedule of penalties at 11 C.F.R. § 111.44. They were notified by the Reports Analysis Division ("RAD") on February 1, 2011 of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") requires that the principal campaign committee of a candidate must notify the Commission, in writing, of any contribution of \$1,000 or more received after the 20th day but more than 48 hours before an election. The principal campaign committee must notify the Commission within 48 hours of receipt of the contribution. The 48-hour notification shall be in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(A) and 11 C.F.R. § 104.5(f). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(r). The respondents' written response must detail the factual basis supporting its challenge and include supporting documentation. 11 C.F.R. § 111.35(e).

Respondents' Challenge

On March 1, 2011, the Commission received the written response ("challenge") from the Treasurer who asks that the fine be revoked. He contends they did not have to file because the Candidate was not involved in the Primary Election. Since the Candidate had no opponent in the September 14 Primary, he was not on the ballot and no one voted for him. He disputes that Bob Turner was a candidate who ran "unopposed" maintaining that it is impossible to be a candidate if one's name is not on the ballot.

11092654820

Analysis

The respondents were notified of their obligation to file 48-Hour Notices more than two weeks before the 48-Hour Notice period began. Commission records show that, on August 10, 2010, the Primary Election Report Notice, which includes the reporting requirements of 48-Hour Notices, was sent via email to Laura4BobTurner@aol.com, the email address disclosed on their Statement of Organization.

The respondents assert that they did not need to file the notices since the Candidate had no opposition in the primary and was not on the ballot. The Report Notice citing the 48-Hour Notices also lists the requirements for the 12 Day Pre-Primary Report, including a notation that unopposed candidates and candidates whose names do not appear on the ballot who seek election in the primary must file the referenced reports and notices. Commission records show that the respondents filed the 12 Day Pre-Primary Report on the September 2 deadline. Thus, it appears they understood their obligation to file the pre-primary report, regardless of the Candidate's unopposed status. Following this same logic, the respondents should have known they were required to file the subsequent 48-Hour Notices, yet, they did not file them.

In response to RAD's Request for Additional Information (RAFI) sent on the October Quarterly Report, the Assistant Treasurer, Laura Schreiner, filed a miscellaneous electronic submission on January 14, 2011. In it, she attributes the missing 48-Hour Notices to miscommunication among the campaign staff. According to RAD's telecoms (written records of telephone conversations), on January 31, 2011, the Treasurer told the Reports Analyst that they are facing multiple fines because the person he hired to prepare the reports "dropped the ball." He said he does not understand the filing process and asked if he could hire someone else to prepare the reports. The Analyst replied that he could hire anyone of his choosing, but explained that, as Treasurer, he is ultimately responsible for the timely and accurate filing of reports.

On February 9, 2011, RAD's Compliance Analyst discussed the fine with the Treasurer. The Analyst explained why the respondents were required to file 48-Hour Notices and pointed out that they raised money for the 2010 Primary. In response, the Treasurer insisted there was no Primary Election. He said it does not make sense and the Commission just wants his money. While the respondents claim they were not required to file the notices, it seems from the telecoms and January 14 submission that the failure to file them resulted from negligence, inexperience and miscommunication.

Their challenge fails to address any of the three valid grounds for challenging enumerated at 11 C.F.R. § 111.35(b). These are: (i) the RTE finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Negligence, the treasurer's inexperience, and the failure to know filing dates are included at 11 C.F.R. § 111.35(d) as examples of circumstances that are not considered reasonably unforeseen and beyond the respondents' control. The Reviewing Officer, therefore, recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$5,670.

11092654821

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2264 involving Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2264 that Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$5,670; and
- (3) Send the appropriate letter.

Reviewing Officer: Dayna C. Brown

Attachments

Attachment 1 – Challenge Received from Respondents

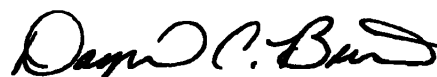
Attachment 2 – Declaration from RAD

Attachment 3 – Declaration from OAR

11092654822

DECLARATION OF DAYNA C. BROWN

1. I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The principal campaign committee of a congressional candidate must file notifications disclosing contributions of \$1,000 or more which are received between August 26 and September 11, 2010. These notifications (also called 48-Hour Notices) must be filed with the Federal Election Commission within 48 hours of the committee's receipt of the contribution(s).
3. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a mailgram they receive or any questions relating to the FECFile software or administrative fine regulations including due dates of reports and filing requirements.
4. I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - (a) Pages 1 and 4 of the Statement of Organization filed by Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer. According to the Commission's records, the document is dated May 16, 2010, was received on May 18, 2010, and lists "Laura4BobTurner@aol.com" as the Committee's email address. On Page 4, it lists "Laura A. Schreiner" as the "Assistant Treasurer;"
 - (b) Page 1 of the Summary Page for the 2010 12 Day Pre-Primary Report electronically filed by Bob Turner for Congress and Laura A. Schreiner, Assistant Treasurer. According to the Commission's records, the report covers the period from July 1 through August 25, 2010, and was received on September 2, 2010;
 - (c) Page 1 of the Summary Page and 4 pages of Schedule A for the 2010 October Quarterly Report electronically filed by Bob Turner for Congress and Laura A. Schreiner, Assistant Treasurer. According to the Commission's records, the report covers the period from August 26 through September 30, 2010, and was received on October 22, 2010. Schedule A lists the receipt of 3 contributions and 1 loan totaling \$53,400.00 on September 1, 3 and 10, 2010. Each contribution and loan equals \$1,000 or more; and
 - (d) The 3 page electronic submission filed by Bob Turner for Congress and Laura Schreiner, Assistant Treasurer. According to the Commission's records, the letter was received on January 14, 2011, and states that "failure to file one or more required 48 hour notices regarding "last minute" contributions occurred due to miscommunication of campaign staff."
5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 21st of March, 2011.



Dayna C. Brown
Reviewing Officer
Office of Administrative Review
Federal Election Commission

11092654823

RECEIVED
FEC MAIL CENTER
2010 MAY 18 AM 11:53

FEC
FORM 1

STATEMENT OF
ORGANIZATION

Office Use Only

1. NAME OF
COMMITTEE (in full)

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4H5

BOB TURNER FOR CONGRESS

ADDRESS (number and street)

78-81 81st STREET

(Check if address
is changed)

GLENDALE

NY

11385

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

(Check if address
is changed)

Laura4BobTurner@aol.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address
is changed)

2. DATE

05/16/2010

3. FEC IDENTIFICATION NUMBER

C

4. IS THIS STATEMENT

X NEW (N)

OR

AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Kevin P. Turner

Signature of Treasurer

Kevin P. Turner

Date

05/16/2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

11092654824
10030332755

Full Name of
Designated
Agent

LAURA A. SCHREINER

Mailing Address

78-81 81st STREET

GLENDALE

CITY

NY

STATE

11385

ZIP CODE

Title or Position

ASSISTANT TREASURER

Telephone number

516-510-5587

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

CITIBANK NA

Mailing Address

156-19 CROSSBAY BOULEVARD

HOWARD BEACH

CITY

NY

STATE

11414

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

11092654825
10030332758

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

Bob Turner For Congress

ADDRESS (number and street)

78-81 81st Street

Check if different
than previously
reported. (ACC)

Glendale

NY

11385

2. FEC IDENTIFICATION NUMBER

C00483495

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS REPORT ☒ NEW (N) OR ☐ AMENDED (A)

NY 09

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

- (b) 12-Day PRE-Election Report for the:

☒ Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on 11 02 2010 in the State of NY

- (c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on In the State of

5. Covering Period 07 01 2010 through 08 25 2010

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Laura A Schreiner

Signature of Treasurer Electronically Filed by Laura A Schreiner

Date 09 02 2010

NOTE : Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office
Use
Only**FEC FORM 3**
(Revised 02/2003)

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

Bob Turner For Congress

ADDRESS (number and street)

78-81 81st Street

Check if different
than previously
reported. (ACC)

Glendale

NY

11385

2. FEC IDENTIFICATION NUMBER

C00483495

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS
REPORT

X

NEW
(N)

OR

AMENDED
(A)

NY

09

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

X October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period 08 26 2010 through 09 30 2010

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Laura A Schreiner

Signature of Treasurer

Electronically Filed by Laura A Schreiner

Date

10

21

2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office
Use
Only**FEC FORM 3**
(Revised 02/2003)

FE5AN018

11092654827

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 5 / 63

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d	<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14	<input type="checkbox"/> 15
---	------------------------------	------------------------------	------------------------------	-----------------------------	------------------------------	------------------------------	-----------------------------	-----------------------------

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Bob Turner For Congress

A.

Full Name (Last, First, Middle Initial)

Thomas R Bachert

Mailing Address 108-13 86th Avenue

City

Richmond Hill

State

NY

Zip Code

11418

FEC ID number of contributing
federal political committee.

C

Name of Employer
RetiredOccupation
Retired

Receipt For: 2010

Primary X General

Other (specify) ▼

Election Cycle-to-Date ▼

300.00

Date of Receipt

M M / D D / Y Y Y Y
09 30 2010

Transaction ID: SA11AI.5845

Amount of Each Receipt this Period

100.00

donation

B.

Full Name (Last, First, Middle Initial)

Benny Barmapov

Mailing Address 31 Fingal Street

City

Staten Island

State

NY

Zip Code

10312

FEC ID number of contributing
federal political committee.

C

Name of Employer

Occupation

Receipt For: 2010

Primary X General

Other (specify) ▼

Election Cycle-to-Date ▼

1000.00

Date of Receipt

M M / D D / Y Y Y Y
09 03 2010

Transaction ID: SA11AI.5758

Amount of Each Receipt this Period

1000.00

donation

C.

Full Name (Last, First, Middle Initial)

Yury Benic

Mailing Address 147-16 Neponsit Avenue

City

Neponsit

State

NY

Zip Code

11694

FEC ID number of contributing
federal political committee.

C

Name of Employer

Occupation

Receipt For: 2010

Primary X General

Other (specify) ▼

Election Cycle-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y
09 01 2010

Transaction ID: SA11AI.5737

Amount of Each Receipt this Period

500.00

donation

SUBTOTAL of Receipts This Page (optional) ▶

1600.00

TOTAL This Period (last page this line number only) ▶

11092654828

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER: PAGE 14 / 63
(check only one)

<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input type="checkbox"/>	11c	<input type="checkbox"/>	11d	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15
	12		13a		13b		14				

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Bob Turner For Congress

A.

Full Name (Last, First, Middle Initial)

Grigori Moysik

Mailing Address 1952 Bergen Avenue
Apt 2ECity State Zip Code
Brooklyn NY 11234FEC ID number of contributing
federal political committee. C

Name of Employer Occupation

Receipt For: 2010
Primary X General
Other (specify) ▼Election Cycle-to-Date ▼
250.00

Date of Receipt

M M / D D / Y Y Y Y
09 10 2010

Transaction ID: SA11AI.5769

Amount of Each Receipt this Period
250.00

donation

B.

Full Name (Last, First, Middle Initial)

Dawn Nacional

Mailing Address 187B Beach 100th Street

City State Zip Code
Rockaway Park NY 11694FEC ID number of contributing
federal political committee. C

Name of Employer Occupation

Receipt For: 2010
Primary X General
Other (specify) ▼Election Cycle-to-Date ▼
1200.00

Date of Receipt

M M / D D / Y Y Y Y
09 10 2010

Transaction ID: SA11AI.5770

Amount of Each Receipt this Period
1200.00

donation

C.

Full Name (Last, First, Middle Initial)

Joseph Napoli

Mailing Address 3915 Avenue S

City State Zip Code
Brooklyn NY 11234FEC ID number of contributing
federal political committee. C

Name of Employer Occupation

Receipt For: 2010
Primary X General
Other (specify) ▼Election Cycle-to-Date ▼
225.00

Date of Receipt

M M / D D / Y Y Y Y
09 10 2010

Transaction ID: SA11AI.5906

Amount of Each Receipt this Period
225.00

donation

SUBTOTAL of Receipts This Page (optional) ▶

1675.00

TOTAL This Period (last page this line number only) ▶

11092654829

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 20/63

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input checked="" type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Bob Turner For Congress

A.

Full Name (Last, First, Middle Initial)

Robert L Turner

Mailing Address 175 Ocean Avenue

City	State	Zip Code
Rockaway Point	NY	11697

FEC ID number of contributing federal political committee. C H0NY09072

Name of Employer
RetiredOccupation
Retired
 Receipt For: 2010
 Primary X General
 Other (specify) ▼

 Election Cycle-to-Date ▼
 117200.00

Date of Receipt

M M / D D / Y Y Y Y
09 / 01 / 2010

Transaction ID: SA11D.5739

Amount of Each Receipt this Period

1200.00

donation

B.

Full Name (Last, First, Middle Initial)

Robert L Turner

Mailing Address 175 Ocean Avenue

City	State	Zip Code
Rockaway Point	NY	11697

FEC ID number of contributing federal political committee. C H0NY09072

Name of Employer
RetiredOccupation
Retired
 Receipt For: 2010
 Primary X General
 Other (specify) ▼

 Election Cycle-to-Date ▼
 174700.00

Date of Receipt

M M / D D / Y Y Y Y
09 / 24 / 2010

Transaction ID: SA11D.5806

Amount of Each Receipt this Period

7500.00

donation

C.

Full Name (Last, First, Middle Initial)

Robert L Turner

Mailing Address 175 Ocean Avenue

City	State	Zip Code
Rockaway Point	NY	11697

FEC ID number of contributing federal political committee. C H0NY09072

Name of Employer
RetiredOccupation
Retired
 Receipt For: 2010
 Primary X General
 Other (specify) ▼

 Election Cycle-to-Date ▼
 194700.00

Date of Receipt

M M / D D / Y Y Y Y
09 / 27 / 2010

Transaction ID: SA11D.5810

Amount of Each Receipt this Period

20000.00

donation

SUBTOTAL of Receipts This Page (optional)

28700.00

TOTAL This Period (last page this line number only)

28700.00

11092654830

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 21 / 63

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input checked="" type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Bob Turner For Congress

A.

Full Name (Last, First, Middle Initial)

Robert L Turner

Mailing Address 175 Ocean Avenue

City	State	Zip Code
Rockaway Point	NY	11697

 FEC ID number of contributing
 federal political committee.

C H0NY09072

 Name of Employer
 Retired

 Occupation
 Retired

 Receipt For: 2010
 Primary X General
 Other (specify) ▼

 Election Cycle-to-Date ▼
 167200.00

Date of Receipt

 M M / D D / Y Y Y Y
 09 08 2010

Transaction ID: SA13A.5760

Amount of Each Receipt this Period

50000.00

loan

11092654831

SUBTOTAL of Receipts This Page (optional)

50000.00

TOTAL This Period (last page this line number only)

50000.00

January 14, 2011

Ms. Jill Sugarman
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: October Quarterly Report (8/26/10 - 9/30/2010)
Identification Number: C00483495

Dear Ms. Sugarman:

In response to your letter of November 23rd, 2010 to the Bob Turner for Congress Committee the first item regarding Schedule A of the Committee's report indicating failure to file one or more required 48 hour notices regarding "last minute" contributions occurred due to miscommunication of campaign staff.

The second item regarding Commission Regulations requiring that a committee discloses the identification of all individuals who contribute in an excess of \$200 in an election cycle; full name, address, city, state, zip code, occupation and employer as provided by the contributor has been reported and amended on our filing.

The procedure the committee followed to ascertain missing contributor information was as follows:

- The website requested first name, middle name, last name, address, city, state, zip code, occupation and employer. The website link to the donation page of the campaign website is: <https://secure.yourpatriot.com/ow/turner/donate.aspx> (we were technically not able to include a scanned copy of the website page in this response).
- Mailings included a response form requesting name, address, city, state, zip code, occupation and employer and the following: "Contributions to Bob Turner for Congress are not tax deductible for federal income tax purposes. Contributions to Bob Turner for Congress are not tax deductible as charitable contributions for federal income tax purposes. Contributions are limited to \$2,400 per individual per election. Contributions from corporations, foreign nationals, and federal government contractors are prohibited. Federal law requires us to use best efforts to collect and report the name, address, occupation and name of employer of individuals whose contributions exceed \$200 per election cycle. Occupation: _____ Employer: _____ Paid for by Bob Turner for Congress." (We were technically not able to include a scanned original copy of the response form in this response).
- The campaign followed up upon receipt of the contribution within the required 30 days with a letter to contributors missing required occupation and employer information. The letter mailed to contributors missing required information was as follows:

Date

First Name Last Name

Address

City, State Zip

Dear Contributor:

.....

11092654832

ETEXT ATTACHMENT

Thank you very much for your recent contribution to the "Bob Turner for Congress" Committee.

Unfortunately, your contribution response did not include all legally required contributor information. As stated in our original solicitation Federal law requires us to use best efforts to collect and report the name, address, occupation and name of employer of individuals whose contributions exceed \$200 per election cycle.

Please help us and take a moment now to kindly fill in the required missing information below and return this form in the self-addressed envelope included in this mailing.

Employer: _____

Occupation: _____

Sincerely,

"Bob Turner for Congress" Committee

enclosure

Upon receipt of the contributor's response the information was reported.

- Additionally, at fundraisers and events upon arrival at the check in desk if the contributor had failed to provide all required identification information the committee provided and requested the contributor to complete the following form:

"BOB TURNER FOR CONGRESS" RESPONSE FORM

___ Yes, I would like to help Bob please find my donation in the amount of:

___ \$25 ___ \$50 ___ \$100 ___ \$250 ___ \$500 ___ \$1,000 ___ \$2,400 ___ Other

Name: _____

Address: _____

City / State / Zip: _____

Home #: _____

Mobile #: _____

Business #: _____

Email: _____

Occupation: _____

Employer: _____

___ Yes, I would like to volunteer to help send Bob to Washington. Please contact me by:

Please Note:

* Federal law requires us to use best efforts to collect and report the name, address, occupation and name of employer of individuals whose contributions exceed \$200 per election cycle.

* Contributions are limited to \$2400 per individual per election. The primary and general elections are separate

11092654833

ETEXT ATTACHMENT

elections, so individuals may give up to a total of \$4800 for both elections.

Please verify:

- ☐ I am a citizen and permanent resident in the United States.
- ☐ I am not a foreign national who lacks pennanont residence in the United States.
- ☐ I am not a Federal government contractor.
- ☐ This contribution is made from my own funds, and not those of another.
- ☐ This contribution is not made from the funds of a corporation or labor organization.
- ☐ I am at least 18 years old.

* Contributions to Bob Turner for Congress are not tax deductible for federal income tax purposes. Contributions to Bob Turner for Congress are not tax deductible as charitable contributions for federal income tax purposes.

Authorized and Paid for by Bob Turner for Congress

- Also attempts were made to locate contributors through telephone directories and reach the individual by telephone to request a response to missing information.

- Third and lastly, report was updated with response information and request referenced.

Sincerely,
Laura Schreiner
Assistant Treasurer

Sincerely,
Laura Schreiner
Assistant Treasurer

11092654834



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

March 22, 2011

Kevin P. Turner, in official capacity as Treasurer
Bob Turner for Congress
85-49 105th Street
Richmond Hill, NY 11418

C00483495
AF# 2264

Dear Mr. Turner:

On January 27, 2011, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Bob Turner for Congress and you, in your official capacity as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to timely file 48-Hour Notices for 3 contributions and 1 loan totaling \$53,400 for the 2010 New York Primary Election. The Commission also made a preliminary determination that the civil money penalty was \$5,670 based on the schedule of penalties at 11 C.F.R. § 111.44.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

Dayna C. Brown
Reviewing Officer
Office of Administrative Review

Attachment

11092654835



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2011 APR -7 P 4: 28

April 7, 2011

MEMORANDUM

SENSITIVE

To: The Commission

Through: Alec Palmer
Acting Staff Director *AP*

From: Patricia Carmona *PC*
Chief Compliance Officer

Dayna C. Brown *DCB*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2264 – Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer (C00483495)

On January 27, 2011, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file 48-Hour Notices for three contributions and one loan of \$1,000 or more received between August 26 and September 11, 2010, and totaling \$53,400. The Commission also made a preliminary determination that the civil money penalty was \$5,670 based on the schedule of penalties at 11 C.F.R. § 111.44.

On March 1, 2011, the Commission received the respondents' written response ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation dated March 21, 2011 was forwarded to the Commission, a copy was forwarded to the respondents', and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that they violated 2 U.S.C. § 434(a) and assess a \$5,670 civil money penalty because they submitted no evidence that a factual error was made in the RTB finding, that the penalty was miscalculated at RTB or that they used best efforts to file the 48-Hour Notices on time. 11 C.F.R. § 111.35(b).

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in the respondents' challenge or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received.

11092654836

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2264 involving Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2264 that Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$5,670; and
- (3) Send the appropriate letter.

11092654837

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 2264
Final Determination Recommendation-)
Bob Turner for Congress and Kevin P.)
Turner, in his official capacity as)
Treasurer (C00483495))

CERTIFICATION

I, Shelley E. Garr, recording secretary for the Federal Election Commission executive session on May 24, 2011, do hereby certify that the Commission decided by a vote of 6-0, on an amended pre-meeting tally, to take the following actions in AF 2264:

1. Adopt the Reviewing Officer recommendation for AF# 2264 involving Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 2264 that Bob Turner for Congress and Kevin P. Turner, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$5,670.
3. Send the appropriate letter.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

May 26, 2011
Date

Shelley E. Garr
Shelley E. Garr
Deputy Secretary of the Commission

11092654838



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin P. Turner, in official capacity as Treasurer
Bob Turner for Congress
85-49 105th Street
Richmond Hill, NY 11385

C00483495
AF# 2264

Dear Mr. Turner:

On January 27, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Bob Turner for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) for failing to file 48-Hour Notices for three contributions and 1 loan, totaling \$53,400 for the 2010 New York Primary Election. By letter dated February 1, 2011, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$5,670 in accordance with the schedule of penalties at 11 C.F.R. § 111.44. On March 1, 2011, the Office of Administrative Review received your written response, challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and the written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Bob Turner for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty in the amount of \$5,670 in accordance with 11 C.F.R. § 111.44. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on March 22, 2011.

On May 24, 2011 the Commission adopted the Reviewing Officer's recommendation and made a final determination that Bob Turner for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty in the amount of \$5,670. A copy of the final determination recommendation is attached.

If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in which the committee or treasurer reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of

the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

If You Choose To Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, send the enclosed form and payment to the address on page 3 within 30 days of receipt of this letter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Dayna Brown on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

On behalf of the Commission,



Caroline C. Hunter
Vice Chair

Attachment

11092654841

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.44, the civil money penalty is \$5,670 for the 2010 48-Hour Notices.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC # 979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Bob Turner for Congress

FEC ID#: C00483495

AF#: 2264

FINAL CIVIL MONEY PENALTY: \$5,670

PAYMENT AMOUNT DUE: \$5,670

FOR: Bob Turner for Congress

FEC ID#: C00483495

AF#: 2264

FINAL CIVIL MONEY PENALTY: \$5,670

PAYMENT AMOUNT DUE: \$5,670

3

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 001 \$ 0000567000 BA# 2 06-06-11 20 4



11092654842

usbancorp.
The New Money Company

ROBERT L TURNER MARGARET TURNER ROCKAWAY PT, NY 11887-0000		CMA Cash Management Account 610 DATE <u>April 4, 2011</u> 25-00/440
PAY TO THE ORDER OF	<u>Federal Election Commission</u>	\$ <u>5,670.00</u>
	<u>Fifty Six Hundred Seventy and 00/100</u>	DOLLARS
<u>By: [Signature]</u> Cash CMAA, One CMAA		
MEMO <u>300624580</u>		



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2264

DATE SCANNED 7-5-11

SCANNER NO. 2

SCAN OPERATOR JmU

11092654843